UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BLVD
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: **ACTION MEMORANDUM:** Request for an Emergency & Time Critical Removal Action at the Bedford Anodizing Site, Macedonia, Summit County, Ohio-Operable Unit 1-Tanks and Vats (Site ID # C518-OU1)

FROM: Joseph Fredle, OSC
Emergency Response Branch 1, Section 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to $1,919,000 to conduct an Emergency and Time-Critical removal action at the Bedford Anodizing Site (the Site) located in Macedonia, Summit County, Ohio. Due to a previous removal action at this site in 2011, this action will be referred to as Operable Unit 1 Tanks and Vats. On August 19, 2013, the On Scene Coordinator issued a verbal authorization to spend up to $50,000 to begin an emergency removal action to mitigate the release at the Site. On August 20, 2013, U.S. EPA mobilized the Emergency and Rapid Removal Services (ERRS) contractor to the Site for purposes of Site preparation and mobilization. On August 27, 2013, the Chief of the ERB increased the verbal authorization for spending by $200,000 to continue emergency removal actions. The emergency and time critical removal actions proposed herein will mitigate the threat to public health, welfare, and the environment posed by the release or substantial threat of a release of hazardous substances and/or pollutants or contaminants to the environment.

The proposed removal action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances and/or pollutants or contaminants. The uncontrolled conditions of the hazardous substances and/or pollutants or contaminants present at the Site require that this action be classified

as an emergency removal action. The project will require approximately 140 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site and the Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: OHN000510564
Category: Emergency Removal Action

Bedford Anodizing Company (Bedford Anodizing) operated an aluminum anodizing business at the Site, performing aluminum anodizing procedures on a variety of parts. Bedford Anodizing's facility, and the property on which it sits, is owned by a Bedford Anodizing Realty Co., Inc. (Bedford Realty). Bedford Anodizing and Bedford Realty appear to be owned by the same individual. Collectively, Bedford Anodizing and Bedford Realty will be referred to as "Bedford" in this memorandum.

In the spring of 2011, Bedford Anodizing discharged wastewater/sludge into waters of the State. Bedford claimed lack of funds to perform the cleanup actions both directly and indirectly through legal counsel. Approximately ½ mile of unnamed tributaries to Brandywine Creek were affected by the release. Brandywine Creek is a recreational creek, which is located approximately 1 mile away from the Site. U.S. EPA performed a cleanup of the stream at that time as an Emergency Removal Action. Bedford Anodizing remained in operation during and after this cleanup.

In May 2013, a bank with a lien on the equipment of Bedford Anodizing assigned its interest, including the lien, to the New Bedford Metal. LLC (NBM).

A. Site Description

1. Removal Site Evaluation

Bedford closed operations in July of 2013. A substantial amount of sodium hydroxide (high pH) and sulfuric acid (low pH) materials were left behind when the facility closed. The anodizing line has 30 vats that contain over 150,000 gallons of liquid and solid waste. The roof leaks and rainwater flows into the vats which overflow to the floor and out of the building into a drainage ditch next to the facility. Collection pits have been dug between the building and ditch. These pits fill up with caustic liquid with a pH of 13 and threaten to overflow into the ditch.

On July 18, 2013, the U.S. EPA On-Scene Coordinator (OSC) met with representatives from Ohio EPA and Bedford's owner to conduct a walkthrough of the Site, they also met separately with NBM's owners. Bedford's owner claimed insolvency with no funds to dispose of the waste left at the Site. NBM's owners claimed no ownership of the waste,

just the containers that contained it. The OSC and representatives from Ohio EPA conducted a visual assessment of Site conditions.

During the walkthrough of the Site, U.S. EPA and Ohio EPA observed that approximately 64 vats, 56 tanks and 300 drums had been abandoned at the facility. An estimated total of 65,000 gallons of caustic liquid waste, 85,000 gallons of acid liquid waste and 1000 cubic yards of caustic solid waste were left at the facility in these containers and on the floor. The material on the floor seemed to be migrating to the outside collection pits near the drainage ditch on the east side of the facility. The roof of the facility leaked and when it rained the rain water that flowed into the facility would flow through the waste on the floor and exit the building. This rain water would become contaminated to a pH of 13 and collect in the pits near the drainage ditch. These pits would fill up and overflow into the ditch if not pumped out. The OSC and Ohio EPA were concerned that a release to the ditch would occur and agreed to monitor the situation. On August 19, 2013, the OSC determined that immediate action was needed to prevent the discharge of any caustic liquid from the pits to the ditch. The OSC activated the ERRS contractor to pump out the pits and clean up as much of the caustic solids on the floor as possible to prevent rain water from transporting waste outside of the facility to the pits.

During this activity, a leak from an acid vat occurred and a cleanup of that leak took place. Also, most of the rain water from the roof leak was redirected to flow away from the contaminated floor area. On September 11, 2013, the OSC mobilized the ERRS contractor again to pump down the pits so they would not overflow caustic liquid to the ditch.

From September 17 to 26, 2013, the ERRS contractor was again mobilized to the site to attempt on site treatment of the liquid waste. A batch test neutralized the waste but produced a substantial amount of solids that would not settle out of the liquid phase. The ERRS contractor planned to discharge the neutralized liquid waste to the sanitary sewer but it could not due to the high amount of solids remaining in the liquid. Thus, the Site was demobilized until disposal arrangements could be made for the liquids as acid and caustic hazardous waste.

By October 9, 2013, the disposal arrangements were complete and the ERRS contractor again mobilized to the Site. The ERRS contractor sent 18,600 gallons of acid liquids and 17,500 gallons of caustic liquids from the vats on the anodizing line offsite for disposal. The ERRS contractor then used the empty capacity in the vats generated from these shipments to neutralize the rest of the caustic liquids with some of the acid that was left on site. They also installed a series of weirs in the drainage ditch to contain any caustic liquids that might overflow from the containment pits located adjacent to the building. On October 25, 2013, the ERRS contractor was demobilized because there were no additional activities that could be completed with the funds remaining in the contractor's ceiling.

On December 5, 2013, the Ohio EPA received a report of a fish kill in an unnamed tributary of Brandywine Creek. Ohio EPA confirmed the fish kill and found a green discoloration in the stream. Ohio EPA notified ODNR and U.S. EPA. Ohio EPA and U.S. EPA traced the source of the contamination back to the Bedford Anodizing site. They found the drainage ditch behind the facility (to the east) full of sludge with both high (pH 13) and low (pH 1) pH readings in separate locations in and near the ditch. The material in the ditch resembled the material left at the facility after the October 25, 2013 demobilization of the Site. Numerous vats in the facility had been emptied of their contents and four of them had been moved to the area in the facility where NBM had been cutting metal for the purpose of selling it as scrap. The OSC estimates that NBM removed at least 17,200 gallons of liquid waste and sludge from the vats since October 25, 2013. Some of this waste may have been pumped to the drainage ditch to the east of the facility.

On December 5, 2013, the OSC activated the ERRS contractor for a second emergency removal at this site to remove the sludge from the drainage ditch. By 11:30 p.m. that evening, about 4000 gallons of liquid were removed from the ditch and placed in vat 43 for temporary storage. Also, 1800 gallons of sludge were removed from the ditch and sent off site for disposal. On December 6, 2013, the OSC observed additional sludge in the ditch that had been overlooked in the darkness of the prior evening. An additional 470 gallons of sludge was removed from the ditch for disposal off site.

On January 22, 2014, the ERRS contractor was again mobilized to the Site to pump down three tanks that had started to leak in the cold weather. The ERRS contractor sent 1600 gallons of acid off site for disposal.

2. Physical location

The Site is located at 7860 Empire Parkway, Macedonia, Summit County, Ohio, 44056. The geographical coordinates for the Site are 41° 17" 35' North latitude and -81° 30" 1' West longitude. The Site is located in an industrial area surrounded by wetlands.

The neighboring property that was affected by the release is comprised of 67 acres of wetlands. This property is surrounded by other wetlands and/or industrial properties.

The area surrounding the Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S.EPA Region 5. The Site is in a census tract with a score of 5. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern. Please refer to the attached EJ analysis for additional information (Attachment 1).

3. Site characteristics

When it operated its aluminum anodizing business, Bedford Anodizing discharged its wastewater first through an on-site treatment system and then into the sanitary sewer

under a permit issued by Summit County. Based on information currently available, the sanitary sewer to which Bedford Anodizing discharged its wastewater has been blocked by the County. The OSC has also determined that some of the seepage of caustic liquid into the pits is from contamination under the foundation of the facility.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The release and threatened release into the environment of hazardous substances and/or pollutants or contaminants occurred when caustic liquid, with a pH of 13, flowed from the facility or its foundation to the drainage ditch to the east of the building at the Site. A release also occurred when waste from the Site was discharged into the drainage ditch to the east of the building and flowed to a nearby creek and onto the property surrounding Bedford's facility. Field tests found that the released material contained both strong acid (pH 1) and strong caustic (pH 13) solutions. Analytical results from the samples collected by Ohio EPA indicated that the released material also contained chromium. In addition, the released material contained aluminum hydroxide.

5. NPL status

There are no nationally significant or precedent setting issues associated with this Site and the Site is not on the National Priorities List (NPL).

6. Maps, pictures and other graphic representations

Figure A-1 Ecological Assessment Map and A-2 Photo Log are included as attachments.

B. Other Actions to Date

1. Previous actions

In the spring of 2011, Bedford Anodizing discharged wastewater/sludge into waters of the State. Bedford claimed lack of funds to perform the cleanup actions both directly and indirectly through legal counsel. Approximately ½ mile of unnamed tributaries to Brandywine Creek were affected by the 2011 release. U.S. EPA performed a cleanup of the stream at that time as an Emergency Removal Action.

2. Current actions

U.S. EPA has mobilized its ERRS and START contractors to the Site to begin removal of the released material from the ditch. As of the date of this Action Memorandum, the contractors have installed weirs to control water flow and have removed material from approximately 200 feet of the creek behind the facility. The contractors have pumped caustic liquid out of the collection pits more than 10 times and sent 18,600 gallons of acid liquids and 17,500 gallons of caustic liquids from the vats on the anodizing line offsite for disposal. ERRS then used the empty capacity in the vats generated from these shipments to neutralize the rest of the caustic liquids with some of the acid that was left

on site. ERRS removed 2300 gallons of sludge from the ditch and disposed of it off site after the December 2013 release. Also, ERRS removed another 1600 gallons of acid liquid from leaking tanks and disposed of it off site in January 2014.

C. State and Local Authorities' Roles

1. State and local actions to date

Ohio EPA issued a Notice of Violation to the facility's owner for the alleged unlawful discharge of sludge/wastewater into waters of the State and is continuing with enforcement actions against NBM as the alleged operator of the Site.

2. Potential for continued State/local response

Ohio EPA, Bedford, and NBM have indicated they do not have the resources to perform a cleanup.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for an emergency removal action as provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances and/or pollutants or contaminants;

Waste containing hazardous substances and/or pollutants or contaminants has been released from Bedford's facility into a nearby creek. The waste killed fish and discolored the water up to a mile downstream from the facility. Water fowl (Canadian Geese) have been observed in the creeks, and other evidence of the presence of animals (e.g., beaver dam, animal prints in the material) has been observed. The released material forms a gel when exposed to water and settles to the bottom of the affected waterbody, thereby increasing the risk of exposure to any burrowing animals and smothering benthic organisms. Bedford's facility itself is in a gated area; however, there is unobstructed access to the affected creek, which is susceptible to trespass.

Analysis of the released material in the area of the eastern ditch found that the northern portion of the ditch had a field pH of less than 2 and the southern portion of the ditch had a field pH of greater than 12.5. Ohio EPA analytical results show the material contained hazardous waste due to the characteristic of corrosivity and the toxicity characteristic of chromium at 16 parts per million [ppm], which is over the limit of 5 ppm set by 40 C.F.R. § 261.24, Table 1.

Actual or potential exposure to nearby animal populations from hazardous substances and/or pollutants or contaminants

The hazardous substances and/or pollutants or contaminants listed above pose threats to the animals that may inhabit the affected areas. The actual or potential ecological effects of these hazardous substances and/or pollutants or contaminants on nearby animal populations are as follows.[1]

Chromium

There is no significant biomagnification of chromium in aquatic food webs (ATSDR, 1993). However, there are a wide range of adverse effects in aquatic organisms. In benthic invertebrates, reduced fecundity and survival, growth inhibition, and abnormal movement patterns have been observed (U.S. EPA 1980b). Fish experienced reduced growth, chromosomal aberrations, reduced disease resistance, and morphological changes.

The toxic effects of chromium are primarily found at the lower trophic levels. The main potential ecological impacts result from direct exposure of algae, benthic invertebrates, and embryos and fingerlings of freshwater fish and amphibians to chromium. Chromium may bioaccumulate in algae, other aquatic vegetation, and invertebrates, but it does not biomagnify. Chromium inhibits growth in duckweed and algae, reduces fecundity and survival of benthic invertebrates, and reduces growth of freshwater fingerlings. It is cancer-causing, mutation-causing, and teratogenic.

Actual or potential exposure to nearby human populations from hazardous substances and/or pollutants or contaminants

The hazardous substances and/or pollutants or contaminants listed above may pose threats to nearby human populations. The actual or potential effects to nearby human populations are as follows.[2]

Chromium

According to the ATSDR ToxFAQ for Chromium, skin contact with certain chromium(VI) compounds can cause skin ulcers. Some people are extremely sensitive to chromium(VI) or chromium(III). Allergic reactions consisting of severe redness and swelling of the skin have been noted. Ingesting high levels of chromium(VI) may result in anemia or damage to the stomach or intestines.

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[1] The information for chromium was obtained from the U.S. EPA Ecological Risk Website (online address www.epa.gov/region5superfund/ecology/html/toxprofiles.htm).

[2] The information for chromium was obtained from the Agency for Toxic Substances and Disease RegistryToxFAQs (online address www.ATSDR.CDC.gov/toxfaqs/index.asp#c).

The DHHS, IARC, and the EPA have determined that chromium(VI) compounds are known human carcinogens. In workers, inhalation of chromium(VI) has been shown to cause lung cancer. Chromium(VI) also causes lung cancer in animals. An increase in stomach tumors was observed in humans and animals exposed to chromium(VI) in drinking water. Chromium can easily change from one form to another in water and soil, depending on the conditions present. (ATSDR, 2008).

Actual or potential contamination of drinking water supplies or sensitive ecosystems;

The hazardous substances and/or pollutants or contaminants had entered a creek on a neighboring property designated as a wetland environment according to the studies conducted by the property owners. The creek is a tributary to the Brandywine Creek, which is a tributary to the Cuyahoga River which flows through the Cuyahoga Valley National Park, which is approximately 2 miles from the Site, and eventually empties into Lake Erie. The area surrounding the Site was screened for Ecological concerns using Region 5's EJ assist Tool. The area is in the National Wetlands Inventory and is also in the Great Lakes Area of Concern (see Figure A-1).

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The wastewater/sludge has been released into an unnamed creek. Heavy rains could cause further releases and wash the material further downstream, or flooding could cause the material to flow out of the creeks and into the wetlands. The wastewater/sludge, which contains hazardous substances and/or pollutants or contaminants, has been released into the environment. Left alone, the waste may migrate further downstream.

The availability of other appropriate Federal or state response mechanisms to respond to the release

In July 2013, Ohio EPA requested U.S.EPA's assistance in mitigating the potential threats at the Bedford Anodizing Site. Ohio EPA, the Site owner/operator, the equipment owner/operator, and Summit County have indicated they do not have the resources to perform a cleanup.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the suspected hazardous substances and/or pollutants or contaminants on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances and/or pollutants or contaminants from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions Taken

1. Action description

Removal activities on Site will include:

a) Develop and implement a Site Health and Safety Plan and Site Security Plan;

b) Characterize, and properly dispose of the released material;

c) Removing and disposing of all acid, caustic, and other hazardous substances found at the Site;

d) Investigate and mitigate the source of caustic seepage into the drainage ditch to the east of the building;

e) Taking any other action necessary to address any release or threatened release of a hazardous substance, pollutant, or contaminant that the U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of 40 C.F.R. § 300.415(l). Elimination of all threats presented by hazardous substances in the buildings, however, is expected to minimize the need for post-removal Site control.

All hazardous substances and/or pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or Relevant and Appropriate Requirements (ARARs)

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances.

Federal

RCRA Subtitle C

State

On February 4, 2014, a letter was sent to Mr. Frank Zingales of Ohio EPA asking for any State of Ohio ARARs which may apply. To date, U.S. EPA has not received a response from Ohio EPA.

5. Project Schedule

The removal activities are expected to take 140 on-site working days to complete.

6. Disproportionate Funding

The response actions described in this memorandum directly address the actual or threatened release at the Site of hazardous substances and/or pollutants or contaminants, which may pose an imminent and substantial endangerment to public health, welfare, or the environment. EPA does not believe that these response actions will impose a disproportionate burden on the affected property.

B. Estimated Costs

The detailed cleanup contractor cost is presented in Attachment 2 and the Independent Government Cost Estimate is presented in Attachment 3. Estimated project costs are summarized below:

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs:	
Regional Removal Allowance Costs:	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 10% contingency)	$1,532,300
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	$ 67,000
Total Decontamination, Analytical & Tech. Services (DATS)	$ 0
Total CLP	$ 0
Subtotal	$ 67,000
Subtotal Extramural Costs	$1,599,300
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded to nearest thousand)	$ 319,700
TOTAL REMOVAL ACTION PROJECT CEILING	**$1,919,000**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Contamination likely will continue to migrate from the Site to the nearby creek and wetlands if action is delayed or not taken. Furthermore, delayed action may increase the risk to the environment and animal populations if the hazardous substances and/or pollutants or contaminants in the affected streams are not addressed.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total U.S. EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $3,157,918.[3]

($1,919,000+ $100,000) + (56.41% x $2,019,000) = $3,157,918

IX. RECOMMENDATION

This decision document represents the selected removal action for the Bedford Anodizing Site- Operable Unit 1 (Tanks and Vats), located at 7860 Empire Parkway, Macedonia, Summit County, Ohio. It was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site (Attachment 4). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action.

The project ceiling previously approved was $250,000. The total removal action project ceiling if approved will be $1,919,000. Of this, an estimated $1,852,000 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE Rachel Kl DATE: 4-29-14
Director, Superfund Division

DISAPPROVE _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Figure:

A-1: Ecological Assessment Map
A-2: Photo Log

Attachments

1. Environmental Justice Analysis
2. Detailed Cleanup Contractor Cost Estimate
3. Independent Government Cost Estimate
4. Administrative Record Index

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[3] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

cc: S. Fielding, U.S. EPA
(Email: fielding.sherry@epa.gov)
D. Valencia, U.S. DOI, w/o Enf. Addendum
(Email:Valencia_Darby@ios.doi.gov)
Lindy Nelson, U.S. DOI, w/o Enf. Addendum
(Email: lindy_nelson@ios.doi.gov)
Scott Nally, Director, OEPA, w/o **Enf. Addendum**
(Email: scott.nally@epa.state.oh.us)
Mike DeWine, Ohio Attorney General, **w/o Enf. Addendum**
(Email: Dale.Vitale @ohioattorneygeneral.gov)

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED – SIX PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

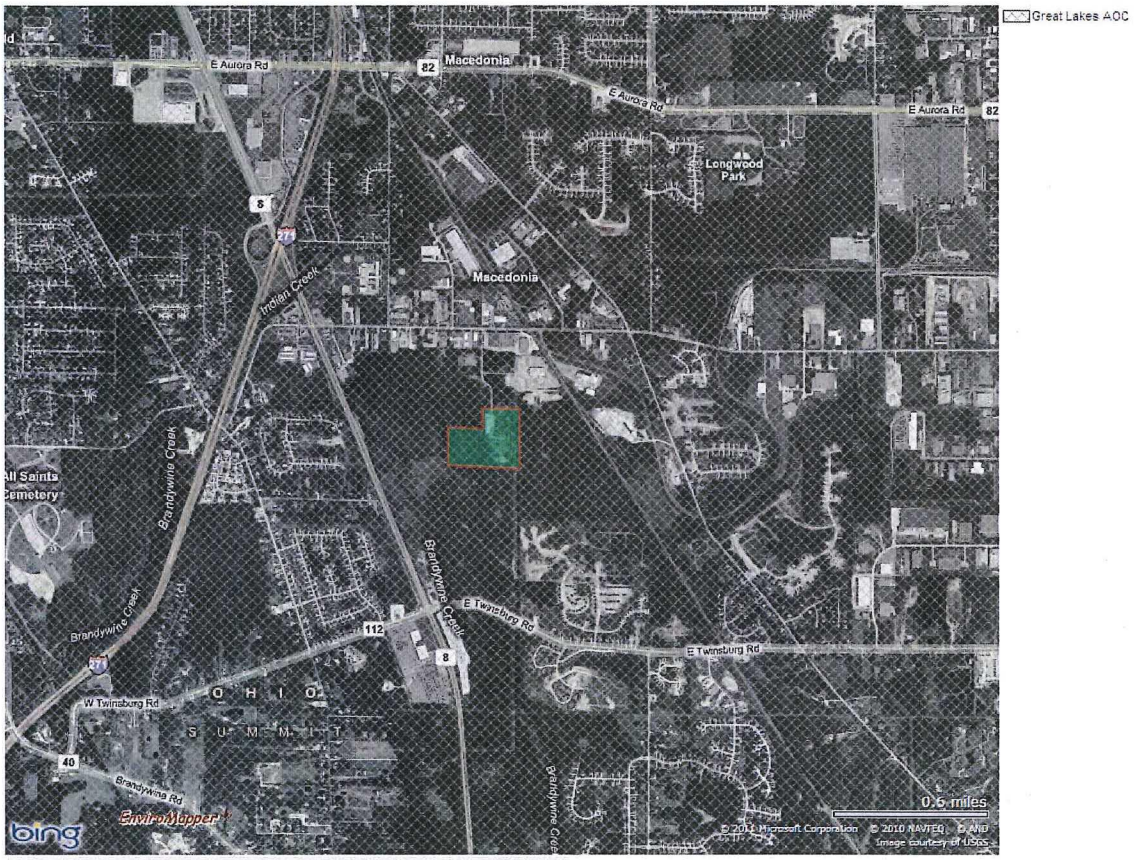
FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

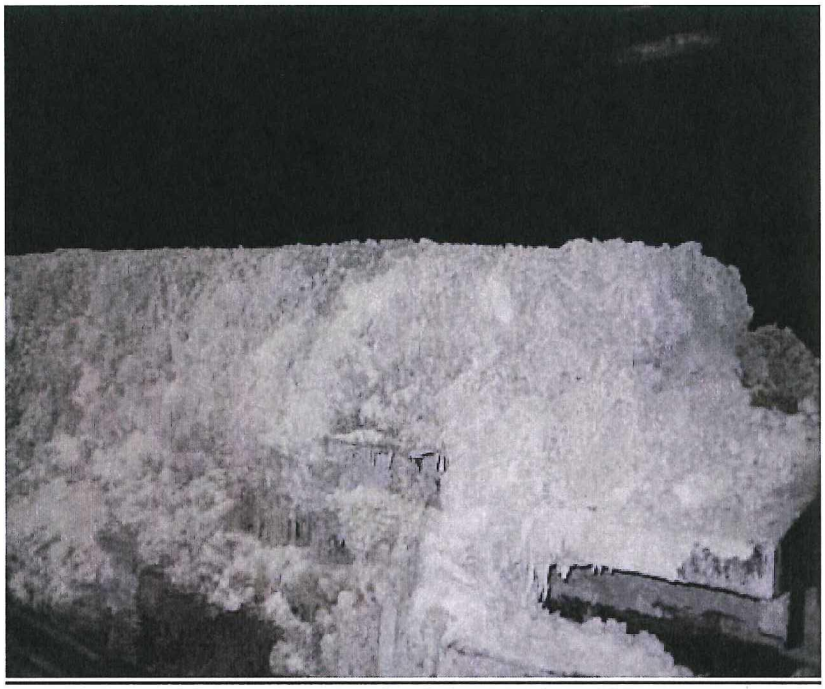
FIGURE A-1

ECOLOGICAL ASSESSMENT MAP
BEDFORD ANODIZING SITE
OPERABLE UNIT 1- TANKS AND VATS
MACEDONIA, OHIO



Area of digitized polygon	0.05 sq mi
⊟ Eco	
Within a Great Lakes Area of Concern?	yes
Within a NWI Wetland?	yes

FIGURE A-2
PHOTO LOG



Vat overtopped with caustic solids

Full vat of acid

Typical floor contamination

Sludge found on the east side of facility on 12/5/13

Sludge in ditch after release

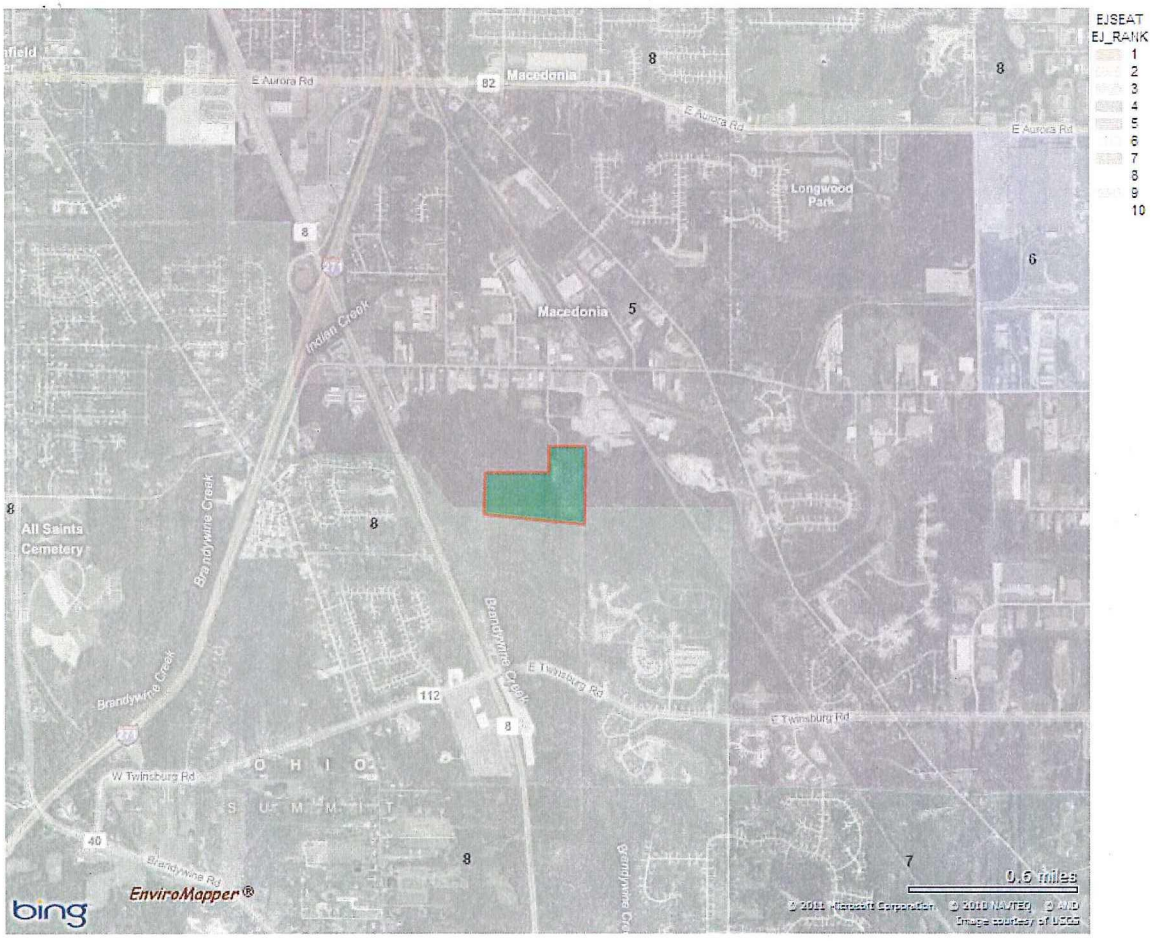
Collection pit on east side of facility full of caustic (brown) liquid

ATTACHMENT 1

Environmental Justice Analysis
Bedford Anodizing Site
Operable Unit 1- Tanks and Vats
Macedonia, OH
April 2014

The area surrounding the Bedford Anodizing Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Bedford Anodizing Site is in a census tract with a score of 5. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern.

Bedford Anodizing Site Map Showing EJ SEAT Values For Surrounding Area



ATTACHMENT 2

DETAILED CLEANUP CONTRACTOR ESTIMATE HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT 3

INDEPENDENT GOVERNMENT COST ESTIMATE

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 4

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
BEDFORD ANODIZING SITE, OPERABLE UNIT 1, TANKS AND VATS
MACEDONIA, SUMMIT COUNTY, OHIO

ORIGINAL
APRIL 28, 2014
SEMS ID:

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	910059	00/00/00	File	File	Photograph - U.S. EPA POLREP #1	1
2	393982	05/31/11	Wolfe, S., U.S. EPA	Distribution List	U.S. EPA POLREP #4	5
3	404957	06/15/11	Wolfe, S., U.S. EPA	Distribution List	U.S. EPA POLREP #5	5
4	406531	07/18/11	Wolfe, S., U.S. EPA	Distribution List	U.S. EPA POLREP #6 Final	5
5	911175	04/26/13	Test America	OH EPA	Analytical Report (J23152-1)	25
6	910060	08/21/13	Fredle, J., U.S. EPA	Durno, M., U.S. EPA	U.S .EPA Email - Information Regarding Bedford Anodizing	1
7	910061	08/27/13	Fredle, J., U.S. EPA	Johnson, M., U.S. EPA	U.S .EPA POLREP #1 - Initial	3
8	910064	08/27/13	Fredle, J., U.S. EPA	Durno, M., U.S. EPA	U.S. EPA Email - Bedford Anodizing Ceiling Increase	1
9	910062	11/18/13	Fredle, J., U.S. EPA	Johnson, M., U.S. EPA	U.S .EPA POLREP #2	3
10	910063	12/23/13	Fredle, J., U.S. EPA	Johnson, M., U.S. EPA	U.S .EPA POLREP #3	3
11	911176	12/26/13	Test America	OH EPA	Analytical Report (J32208-1)	39

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
12	911177	12/26/13	Test America	OH EPA	Analytical Report (J32210-1)	20
13	911178	02/12/14	Test America	OH EPA	Analytical Report (J33580-1)	56
14	911173	02/14/14	Zingales, F., OH EPA	Distribution List	OH EPA Letter - Notice of Violation	7
15	911174	04/18/14	Blair, M., Weston Solutions	Fredle, J., U.S. EPA	Letter Report	32
16	******	00/00/00	Fredle, J., U.S. EPA	Karl, R. U.S. EPA	Action Memorandum: Request for an Emergency & Time Critical Removal Action at the Bedford Anodizing Site, Operable Unit 1, Tanks and Vats **(PENDING)**	